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February 19, 2019

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Suite TW-A325  
Washington, DC 20554

**RE: EB Docket No. 06-36**

Dear Ms. Dortch:

Pursuant to Commission Rule 47 C.F.R. Section 64.2009(e), CenturyLink hereby submits its annual CPNI Certification for 2018 for its affiliates listed on "Exhibit 3" of the attached document.

Please feel free to contact me if you need additional information.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Linda K. Gardner", written in a cursive style.

Linda K. Gardner

Attachment

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**  
**EB Docket No. 06-36**

Annual 64.2009(e) Customer Proprietary Network Information (CPNI) Certification for 2019, covering the prior calendar year 2018

Date filed: February 19, 2019

Name of companies covered by this certification:

Form 499 Filer ID: See Exhibit 3

Name of signatory: Linda Gardner

Title of signatory: VP Deputy General Counsel, Privacy & Corporate Security

I, Linda Gardner, am an officer of CenturyLink and acting as an agent of that company, and on behalf of the companies identified in Exhibit 3 (collectively CenturyLink), I certify that I have personal knowledge that these companies have established operating procedures that are adequate to ensure compliance with the Federal Communications Commission (FCC) CPNI rules. See 47 C.F.R. § 64.2001 *et seq.* My personal knowledge is based, in part, on the personal knowledge of those persons who represent to me that their organizations have procedures in place adequate to ensure compliance with the FCC's CPNI rules.

Attached to this certification is an accompanying statement (Exhibit 1) describing how the various companies have established operating procedures that are adequate to ensure compliance with the requirements set forth in section 64.2001 *et seq.* of the FCC's rules.

**Actions Against Data Brokers.** None of the CenturyLink companies took action in 2018 against data brokers either in courts or before regulatory bodies.

**Customer Complaints.** See Exhibit 2.

Signed /s/  \_\_\_\_\_

Attachments: Accompanying Statement explaining CPNI procedures, Exhibit 1  
Summary of Customer Complaints, Exhibit 2  
CenturyLink Company Names/499 Filer IDs for CPNI Certification, Exhibit 3

## **EXHIBIT 1 TO COMPLIANCE CERTIFICATE**

### **CenturyLink Statement of Operating Procedures**

CenturyLink<sup>1</sup> has implemented a number of operating processes and procedures to protect sensitive customer information and to help ensure that Customer Proprietary Network Information ("CPNI") is used and maintained consistent with the rules of the Federal Communications Commission (the "Commission"). Below, CenturyLink describes its operating procedures adequate to ensure compliance with the Commission's CPNI rules set forth in 47 C.F.R., Subpart U.<sup>2</sup> The following processes and activities are utilized by CenturyLink prior to its submission of its certification.

1. Leaders of CenturyLink business units that may use CPNI or be involved with sales, marketing, customer care or repair certify to CenturyLink's CPNI Certifying Officer that, based on their personal knowledge, their business and market units have practices and procedures in place adequate to ensure compliance with the FCC's CPNI rules.
2. Apart from such certifications, as part of its standard operating procedures, CenturyLink takes advantage of the expertise and experience of various non-sales and marketing personnel in addressing privacy and CPNI issues. CenturyLink has a Chief Privacy Officer (CPO) within the Legal organization whose duties include advice and counsel on a variety of privacy and CPNI issues. The CPO's team includes personnel knowledgeable in CPNI issues who are primarily designated to address and counsel on the proper uses of CPNI. In addition, the Information Security group assists with many technical aspects of CPNI protection. Finally, CenturyLink employees interact with experienced legal counsel on CPNI matters when legal analysis or advice is required.
3. The CPO team assists CenturyLink business units as CPNI-related issues or questions arise, including those involved in product development, training, supervision of marketing campaigns, and customer care or repair. In addition, a CPO team member also attends weekly meetings where new initiatives and changes to existing processes, which may or may not be related to CPNI, are reviewed. If that CPO team member believes there could be CPNI and privacy related issues that arise out of the project, a CPO team member is included in ongoing meetings to provide continuing advice. This cooperative and collaborative cross-discipline approach to CPNI-issues management creates an atmosphere and structure that frames and supports operating procedures adequate to ensure compliance with the FCC's CPNI rules.
4. CenturyLink employees are required as a general matter to maintain the confidentiality of all information they obtain in connection with their employment, including customer-related information. Employees receive instructions on confidentiality requirements through a variety of mechanisms and programs or procedures, including Code of Conduct, Privacy Awareness training, Information Security training, Employee Handbook and CPNI procedures. The CPNI program explains CenturyLink's legal obligations regarding the use, storage, protection and disclosure of CPNI and discusses the

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<sup>1</sup> On November 1, 2017, CenturyLink completed its acquisition of Level 3 Communications Inc. Exhibit 3 includes the 499 Filer IDs for former Level 3 entities post close. Level 3 entities do not directly serve consumer customers.

<sup>2</sup> Where necessary for clarity, statements or processes may be identified as related specifically to certain legacy companies if there are material differences in approach. See for example, paragraph 9 related to the election of opt-in or opt-out methods.

application of the FCC's rules to the company's operations. New customer care employees receive CPNI orientation as part of their initial job training. In addition, tailored training is conducted as needed or requested by particular work groups to ensure that they more fully understand the requirements as they relate to their particular function. The CPO team also manages a specific email address available internally for CPNI and other privacy-related questions and the external email address available for similar questions by the public.

5. Beyond its formal training, CenturyLink has created CPNI methods and procedures available for employees that are likely to access, use or disclose CPNI. The methods and procedures cover such steps as appropriately authenticating customers, obtaining one-time CPNI use permission, the use of passwords, and any required change notifications. CenturyLink publishes its procedures internally for easy access and consultation and uses those procedures in face-to-face training sessions, as well. Customer care employees have CPNI resources available in their online reference repository and supervisors periodically provide refresher training on the procedures. CenturyLink periodically reviews these trainings, methods, and procedures to identify opportunities to improve their effectiveness.
6. CenturyLink takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. CenturyLink has procedures in place regarding proper customer authentication, requests for call detail information, on-line access to CPNI, change notifications, and address of record designations, among other requirements, consistent with the CPNI rules. CenturyLink also has a robust Information Security Program that includes administrative, technical and physical security. This program includes controls designed to limit access to information to only those persons with duties that require access to CPNI to perform their job functions such as responding to customer questions about their service or bill, or to address requests for troubleshooting or repair. CenturyLink performs routine security evaluations and assessments on its systems, including those containing CPNI. Additionally, CenturyLink performs external penetration tests on Internet-facing web portals and websites to ensure proper security.
7. CenturyLink has communicated to its employees the importance of providing prompt notification of any breaches with respect to the security of customer information, including CPNI, and the time frames for such required by the Commission's rules. Employees have readily available contact information to help ensure that appropriate teams receive rapid notification of any potential breaches and the team members understand their roles and responsibilities for investigating, mitigating, notifying and correcting any breach. When the reporting of CPNI breaches is required under the FCC-mandated process (i.e., to the Data Breach Reporting portal), CenturyLink's CPO team reports the breach and a log of these reports is maintained for at least two years.
8. CenturyLink has adopted disciplinary processes, incorporated into the company's corporate compliance procedures and communicated to employees, to address employee mishandling or misuse of CPNI. Corporate Security, Legal or Human Resources personnel investigate instances of potential improper access to or disclosure of CPNI by employees. If the investigation indicates a violation has occurred, appropriate disciplinary action, ranging from coaching to termination, will follow.
9. CenturyLink's companies that use CPNI for marketing purposes use either the opt-out or opt-in method to obtain customer approval, depending upon the legacy company. An

opt-in mechanism is currently used for legacy Qwest customers. For legacy CenturyLink companies, customers are first informed of the opt-out procedures through a CPNI notice sent to new customers and are given a minimum of at least 30 days to opt-out prior to CenturyLink using their CPNI for marketing purposes. CenturyLink sends out biennial opt-out notices to its customer base, the last of which was sent in 2017. Customers are able to opt-out at no cost to them and to change their decision as they choose by contacting the company. There is a toll-free phone number available to provide 24x7 access for customers to record their election. Legacy Level 3 has also adopted an opt-out approach to using CPNI for direct sales and marketing activities. Under this approach, Level 3 provides notice to each customer that Level 3 intends to utilize the customer's CPNI in sales and marketing campaigns that cross the categories of service established by the Commission. The customer may opt out by completing an opt-out form and submitting it to Level 3. Initial opt-out notices that comply fully with 47 CFR § 64.2008(c) are mailed to all new customers within 30 days of activation of service. Renewal notices are sent out at least 60 days prior to the two-year anniversary of the mailing of the first opt-out notice. To ensure that any opt-out responses are properly processed and recorded, Level 3 has established a 45-day waiting period. In addition, the combined company has processes in place to obtain one-time use of CPNI on inbound calls when customers that have opted out (or not opted-in) seek to obtain services outside the category of services to which the customer currently subscribes, consistent with the notice requirements of 47 CFR § 64.2008(f)(2).

10. For legacy CenturyLink, the database marketing group generates customer lists for all marketing campaigns. Supervisory review occurs to identify those marketing campaigns that intend to use CPNI to market telecommunications services beyond those that customers currently subscribe to. Records are generated regarding the campaign, including such details as: a description of the campaign (including the proposed dates and campaign purpose), any CPNI that was used and the products or services intended to be offered. Documentation of campaigns is maintained for one year. Use of the CPNI by agents for marketing campaigns is also documented. For legacy Level 3, all sales and marketing personnel are trained on the restrictions that apply to opt-out customers and the requirement to check customer account records for an opt-out flag before contacting an existing customer for the purposes of selling or marketing services outside the customer's existing categories of service. The business unit that is responsible for designing sales and marketing campaigns also maintains records which comply with 64.2009(c) by including a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as part of the campaign. These records are maintained for a period of one year.
11. CenturyLink may use employees or agents to market and sell its services. When it works through agents, the agents are required to abide by all CPNI regulations, and to have appropriate protections and training in place to ensure the ongoing confidentiality of the CPNI; limit access to persons who have a need to know such information in connection with the performance of the contract; and restrict the use of CPNI solely to the performance of the contract, in connection with the provisioning and marketing of communications related services and products.
12. CenturyLink's standard contracts with suppliers and agents treat CPNI as confidential, subject to protection from inappropriate disclosure.

13. CenturyLink's Privacy Policy and associated Frequently Asked Questions (FAQs) also include a lengthy discussion of CPNI, with a link to the FCC's webpage that addresses CPNI and the Commission's rule.

## **EXHIBIT 2 TO COMPLIANCE CERTIFICATE**

### **Summary of CenturyLink Complaints or Incidences Concerning Unauthorized Release of CPNI**

In 2018, CenturyLink had no substantiated customer complaints or incidences regarding the unauthorized release of CPNI. Potential sources for capturing customer complaints regarding unauthorized use of CPNI include calls to the business office, calls to the executive hotline, and e-mails to the Office of Privacy.

**Exhibit 3 TO COMPLIANCE CERTIFICATE****CenturyLink Company Names/ 499 Filer IDs for CPNI Certification**

<b>Company Name</b>	<b>499 Filer ID</b>
CenturyTel of Port Aransas, Inc.	804156
CenturyTel of Claiborne, Inc.	804159
CenturyTel of Mountain Home, Inc.	804165
CenturyTel of North Mississippi, Inc.	804168
CenturyTel of Arkansas, Inc.	804171
CenturyTel of South Arkansas, Inc.	804180
CenturyLink of Louisiana, LLC	804186
CenturyTel of Odon, Inc.	804192
CenturyTel of Central Indiana, Inc.	804195
CenturyTel of Midwest - Michigan, Inc.	804201
CenturyTel of Wisconsin, LLC	804204
CenturyTel of Southern Wisconsin, LLC	805725
CenturyTel of Fairwater-Brandon-Alto, LLC	803583
CenturyTel of Chester, Inc.	804207
CenturyTel of Idaho, Inc.	804210
CenturyTel of Adamsville, Inc.	804213
CenturyTel of Redfield, Inc.	804216
CenturyTel of Central Arkansas, LLC	820918
CenturyTel of Northwest Arkansas, LLC	803998
Spectra Communications Group, LLC	820461
Telephone USA of Wisconsin, LLC	820906
CenturyTel of Central Wisconsin, LLC	820908
CenturyTel of Michigan, Inc.	804219
CenturyTel of Forestville, LLC	804222
CenturyTel of Larsen-Readfield, LLC	804225
CenturyTel of Monroe County, LLC	804228
CenturyTel of Northwest Wisconsin, LLC	804231
CenturyTel of Colorado, Inc.	804234
CenturyTel of Northern Wisconsin, LLC	804237
CenturyTel of the Southwest, Inc.	817886
CenturyTel of Ooltewah-Collegedale, Inc.	804246
CenturyTel of Ohio, Inc.	804249
CenturyTel of San Marcos, Inc.	804255
CenturyTel of Northern Michigan, Inc.	804256
CenturyTel of Lake Dallas, Inc.	802890
CenturyTel of Washington, Inc.	806259
CenturyTel of Inter-Island, Inc.	806260
CenturyTel of Cowiche, Inc.	807099
CenturyTel of Eastern Oregon, Inc.	806263
CenturyTel of Oregon, Inc.	806262
CenturyTel of Montana, Inc.	806265
CenturyTel of the Gem State, Inc.	817854

CenturyTel of Eagle, Inc.	806277
CenturyTel of Wyoming, Inc.	806274
CenturyTel of the Midwest - Wisconsin, LLC	817862
CenturyTel of the Midwest - Kendall, LLC	801408
CenturyTel of Upper Michigan, Inc.	815632
CenturyTel of Minnesota, Inc.	805554
CenturyTel of Postville, Inc.	805557
CenturyTel of Alabama, LLC	822566
CenturyTel of Missouri, LLC	822568
Gallatin River Communications, L.L.C.	818006
Gulf Telephone Company, LLC	802182
Coastal Utilities, Inc.	808152
Mebtel, Inc.	802263
Embarq Corporation	822076
CenturyLink Public Communications, Inc.	820698
The El Paso County Telephone Company	807684
Qwest Corporation	808440
CenturyLink Communications, LLC	808882
Level 3 Communications, LLC	818086
Broadwing Communications, LLC	822866
TelCove of Pennsylvania, LLC	811223
TelCove Operations, LLC	820155
Vyvx, LLC	824554
Wiltel Communications, LLC	805503
Global Crossing Telecommunications, Inc.	803667
Global Crossing Bandwidth, Inc.	809586
Global Crossing Local Services, Inc.	805772
Global Crossing Americas Solutions, Inc. f/k/a Impsat-UAS Inc.	811776
Global Crossing Telemanagement Virginia, LLC	805772
IP Networks, Inc.	823520
ICG Telecom Group, Inc.	808692
Looking Glass Networks of Virginia, Inc.	821970
Looking Glass Networks, Inc.	820045
Progress Telecom, LLC	822572
TelCove of Virginia, LLC	818746
Level 3 Telecom Holdings, LLC (f/k/a TW Telecom Holdings, LLC) <sup>3</sup>	825897
Level 3 Enhanced Services, LLC <sup>4</sup>	No Filer ID

<sup>3</sup> Level 3 Telecom Holdings, LLC includes other affiliated subsidiaries that do not have a separate, unique form 499 filer ID.

<sup>4</sup> Level 3 Enhanced Services, LLC is an affiliate under common ownership with Level 3 Communications, LLC. Level 3 Enhanced Services, LLC provides certain interconnected VoIP services. Level 3 Enhanced Services, LLC does not have a separate, unique form 499 filer ID.